



Mary Kiffmeyer
Secretary of State

**Office of the Secretary of State
State of Minnesota**

100 Constitution Ave., 180 State Office Bldg.
St. Paul, MN 55155-1299

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

MAR 15 3 44 PM '99

Public Information: (651)296-2803
Election Division: (651)215-1440

March 12, 1999

Lawrence M. Noble
General Counsel
Federal Election Commission
999 E. Street NW
Washington, D.C. 20463

AOR 1999-07

Dear Mr. Noble:

I am writing to request an advisory opinion on the following issue:

May a government office that is authorized to sponsor nonpartisan activities to promote voter participation be permitted to provide free hyperlinks between its WEB page and the WEB page of any candidate who provides the Uniform Resource Locator (URL) to that page without violating the provisions of the federal campaign contribution laws?

The Office of the Secretary of State for the State of Minnesota is authorized to sponsor or participate in nonpartisan activities that promote voter participation. See Minnesota Statutes, section 204B.27, subdivision 6. This subdivision specifically states:

The secretary of state may sponsor or participate in nonpartisan activities to promote voter participation in Minnesota elections and in efforts to increase voter registration and voter turnout.

March 12, 1999

Page 2

One of the activities the Office has chosen to sponsor is a WEB site that contains information about all candidate filings for federal, state and county level offices. For an example, please see www.sos.state.mn.us/elections/statewide.html. With the increasing use of the Internet and WEB sites, we anticipate that we will be requested to provide hyperlinks between the WEB page maintained by the Office and candidate WEB pages.

We are willing to provide free hyperlinks for all candidate WEB addresses about which we are informed. We are also considering a disclaimer on our WEB site that would inform users that (1) hyperlinks to candidate sites are done based on addresses (URLs) provided by the candidate; (2) the hyperlinks are displayed for voter information purposes and not to influence the nomination or election of a candidate; and (3) candidate WEB sites are not monitored or regulated by this Office.

Our concern is that a hyperlink between a WEB page owned and maintained by this Office and a candidate's WEB site will be construed as a violation of federal campaign contribution provisions. See, e.g. 2 Record 1-2 (December 1998)(summarizing MUR 4340/4685).

We would appreciate receiving an advisory opinion on this issue. Questions or requests for additional information may be directed to Jeff Sigurdson, Election Advisor, at (651) 215-1439.

Sincerely,



Mary Kiffmeyer
Secretary of State

c: Jeff Sigurdson

Constitutional Offices



Index of Constitutional Offices

- Governor and Lt. Governor
- Secretary of State
- State Auditor
- State Treasurer
- Attorney General

Governor and Lt. Governor

HUBERT H "SKIP" HUMPHREY III AND ROGER D. MOE
DEMOCRATIC FARMER LABOR
GOVERNOR AND LIEUTENANT GOVERNOR
2722 UNIVERSITY AVE. SE
MINNEAPOLIS, MN 55414
612/225- 26

NORM COLEMAN AND GEN OLSON
REPUBLICAN
GOVERNOR AND LIEUTENANT GOVERNOR
1821 UNIVERSITY AVE. W.
SUITE 134
ST. PAUL, MN 55104
651/917-3844

JESSE VENTURA AND MAE SCHUNK
REFORM PARTY
GOVERNOR AND LIEUTENANT GOVERNOR
7060 VALLEY CREEK PLAZA, RM. 115-101
WOODBURY, MN 55125
612/585-0102

Upload PDF Image of KEN PENTEL AND SUSAN JASPER
GREEN PARTY MINNESOTA

GOVERNOR AND LIEUTENANT GOVERNOR
PO BOX 3872
MINNEAPOLIS, MN 55403
612/381-0122

CHRIS WRIGHT AND D.G. PAULSEN
GRASSROOTS PARTY
GOVERNOR AND LIEUTENANT GOVERNOR
6304 FALCON CT.
EDINA, MN 55436
612/920-5024

Upload PDF Image of FRANK GERMANN AND Upload PDF Image of MICHAEL C. STRAND
LIBERTARIAN PARTY
GOVERNOR AND LIEUTENANT GOVERNOR
87 EMERSON AVENUE
WEST ST. PAUL, MN 55118
612/455-0967

THOMAS FISKE AND JOHN HAWKINS
SOCIALIST WORKERS PARTY
GOVERNOR AND LIEUTENANT GOVERNOR
2490 UNIVESITY AVE.
ST. PAUL, MN 55114
651/645-1674

FANCY RAY MCCLONEY AND (MOM) TONI MCCLONEY
THE PEOPLE'S CHAMPION
GOVERNOR AND LIEUTENANT GOVERNOR
519 KNOX AVE. NO.
MINNEAPOLIS, MN 55405
612/491-2068

Secretary of State

Upload PDF Image of EDWINA GARCIA
DEMOCRATIC FARMER LABOR
SECRETARY OF STATE
6908 5TH AVE. S.
RICHFIELD, MN 55423
612/861-6140

MARY KIFFMEYER
REPUBLICAN
SECRETARY OF STATE
16160 201 AVE.
BIG LAKE, MN 55309
612/263-3876

ALAN SHILEPSKY
REFORM PARTY
SECRETARY OF STATE
115 HENNEPIN AVE.
MINNEAPOLIS, MN 55401
612/333-5181

Upload PDF Image of KENNETH IVERSON
LIBERTARIAN PARTY
SECRETARY OF STATE
7286 VISTA COURT
EDEN PRAIRIE, MN 55346

651/223-0995

State Auditor

NANCY A. LARSON
DEMOCRATIC FARMER LABOR
STATE AUDITOR
PO BOX 14195
ST. PAUL, MN 55114-0195
612/665-0961

Upload PDF Image of JUDI DUTCHER

REPUBLICAN
STATE AUDITOR
PO BOX 1022
MINNETONKA, MN 55345
612/448-6188

BOB ODDEN
LIBERTARIAN PARTY
STATE AUDITOR
1201 42 1/2 AVE. NE
COLUMBIA HTS., MN 55421
612/788-3928

Upload PDF Image of PATRICIA G. V. BECKER

MINNESOTA TAXPAYERS PARTY
STATE AUDITOR
23078 21ST AVE.
ST. CLOUD, MN 56301
320/654-0520

Upload PDF Image of JOSEPH G. PESCHEK

PROGRESSIVE MINNESOTA
STATE AUDITOR
1561 WHEELLOCK LANE #305
ST. PAUL, MN 55117
612/488-2057

State Treasurer

CAROL JOHNSON
DEMOCRATIC FARMER LABOR
STATE TREASURER
PO BOX 16506
ST. PAUL, MN 55116
651/451-8801

KEVIN KNIGHT
REPUBLICAN
STATE TREASURER
131 MAPLEWOOD DR.
BLOOMINGTON, MN 55420
612/888-7586

Upload PDF Image of JAMES N. (JIM) DUNLOP
REFORM PARTY

STATE TREASURER
924 MONTEREY DR
SHOREVIEW, MN 55126
612/486-2914

MITCHELL BERG
LIBERTARIAN PARTY
STATE TREASURER
1446 W. MINNEHAHA AVE
ST. PAUL, MN 55104
/ -

Attorney General

Upload PDF Image of MIKE HATCH
DEMOCRATIC FARMER LABOR
ATTORNEY GENERAL
PO BOX 2929
MINNEAPOLIS, MN 55402
612/435-8704

Upload PDF Image of CHARLIE WEAVER
REPUBLICAN
ATTORNEY GENERAL
PO BOX 50379
MINNEAPOLIS, MN 55405
612/422-1322

JIM MANGAN
REFORM PARTY
ATTORNEY GENERAL
SUITE 18
6050 HWY. 10 NW
ANOKA, MN 55303
612/214-7051

RUTH A. MASON
LIBERTARIAN PARTY
ATTORNEY GENERAL
440 OLD HIGHWAY 8
NEW BRIGHTON, MN 55112
651/631-2737

MINNESOTA SECRETARY OF STATE ELECTION CANDIDATE INFORMATION FORM
(Voluntary Disclosure)

Please type or print clearly.

You are invited to complete this form and leave it with the filing officer for public information. Information submitted by state and federal candidates will be scanned and placed on the Secretary of State's web site: www.sos.state.mn.us.

Your name: Ken Pentel Age: 37
Your address: PO. Box 3872 MPLS, MN 55403-0872
Telephone number: 612-381-0122
Preferred mailing address (if different): Same as Above
Occupation and employer: Unemployed
Office sought: Governor
Political party or principle: Green Party of Mn
Current office held: none First year elected or appointed: —
Previous elected or appointed public offices: none

Endorsements: Green Party of Mn

Comments or filing statement (use this space only): We need to invest our resources in such a way that it does not undermine our water, air, soil, and habitats. This investment must embrace full human dignity in our communities.

Ken Pentel
Candidate Signature

8/2/98
Date